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Attorneys for Defendant
PrO Unlimited, Inc.

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

MICHAEL LAZARIN, STEPHEN KOHLER,
and PAUL CAPANO, individually and on
behalf of other members of the general public
similarly situated, and as aggrieved employees
pursuant to the Private Attorneys General Act
("PAGA")

Plaintiffs,

v.

PRO UNLIMITED, INC., JUNIPER
NETWORKS, INC., JUNIPER
NETWORKS HOLDINGS
INTERNATIONALO, INC., and JUNIPER
NETWORKS (US), INC.

Defendants.

Case No. 5:11-CV-03609-HRL

**JOINT STIPULATION TO EXTEND TIME
FOR FILING RULE 26(f) REPORT, INITIAL
DISCLOSURES, AND CMC CONFERENCE;
AND ~~PROPOSED~~ ORDER**

(AS MODIFIED BY THE COURT)

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,
plaintiffs Michael Lazarin, Stephen Kohler, and Paul Capano ("Plaintiffs"), and defendant PrO
Unlimited, Inc. ("Defendant"), by and through their respective attorneys of record, hereby jointly
stipulate and request that the Court vacate the dates set forth in the Order Setting Initial Case
Management Conference and ADR Deadlines filed on July 22, 2011, and that the Court continue
such dates as set forth in the stipulation below. The reason for this request and stipulation is that
Defendant recently retained new counsel and filed a Notice of Withdrawal and Substitution of

WHEREFORE, the Parties hereby stipulate and request as follows:

1. The current deadline of September 27, 2011, to file the Rule 26(f) Report, to complete initial disclosures, to state objections in the Rule 26(f) Report, and to file a Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement, be continued ~~for 30 calendar days to October 27, 2011;~~ **November 15, 2011**
2. The current deadline of September 27, 2011, to file a joint case management statement, be continued ~~for 30 calendar days to October 27, 2011;~~ and **November 15, 2011**
3. The Initial Case Management Conference presently set for October 4, 2011, be continued to ~~November 3, 2011.~~ **November 22, 2011**

IT IS SO STIPULATED.

Date: September 27, 2011

JACKSON LEWIS LLP

By: /s/ Cary G. Palmer

Attorneys for Defendant
PrO Unlimited, Inc.

Date: September 27, 2011

RUKIN HYLAND DORIA & TINDALL LLP

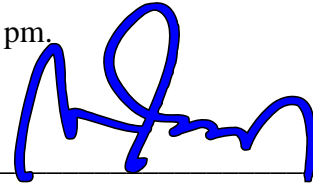
By: /s/
Peter Rukin

Attorneys for Plaintiffs

FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

1. The current deadline of September 27, 2011, to file the Rule 26(f) Report, to complete initial disclosures, to state objections in the Rule 26(f) Report, and to file a Case Management Statement per the Court's Standing Order re Contents of Joint Case Management Statement, is hereby continued ~~for 30 calendar days to October 27, 2011;~~ **November 15, 2011**;
2. The current deadline of September 27, 2011, to file a joint case management statement, is hereby continued ~~for 30 calendar days to October 27, 2011;~~ **November 15, 2011**; and
3. The Initial Case Management Conference presently set for October 4, 2011, is hereby continued to ~~November 3, 2011,~~ **November 22, 2011** at 1:30 pm.

Dated: **September 28, 2011**



HONORABLE HOWARD R. LLOYD
MAGISTRATE JUDGE OF THE
UNITED STATES DISTRICT COURT

4812-1623-7067, v. 1

C 11-03609 HRL Notice will be electronically mailed to:

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